

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
CANDIS J. GARDLEY,  
Defendant.

## STIPULATION FOR PROTECTIVE ORDER

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1           1.     Protected Documents which will be used by the parties include personal identifiers,  
2 including account numbers, Social Security numbers, drivers license numbers, dates of birth,  
3 Email addresses, and physical addresses, of participants, witnesses, and victims in this case.

4           2.     Discovery in this case is somewhat voluminous. Many of the documents include  
5 personal identifiers that may constitute evidence in this case. In addition, redacting the personal  
6 identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery  
7 to defendants.

8           3.     As part of its discovery production, the United States may provide Protected  
9 Documents to Defendant without redacting the personal identifiers of participants, witnesses, and  
10 victims, with the possible exception of certain materials it reserves the right to produce in redacted  
11 form.

12           4.     Access to Protected Documents will be restricted to persons authorized by the  
13 Court, namely Defendant, attorneys of record, and their associated counsels, paralegals,  
14 investigators, experts, and secretaries employed by the attorneys of record and performing services  
15 on behalf of Defendant.

16           5.     The following restrictions will be placed on the above-designated individuals  
17 unless further ordered by the Court. The above-designated individuals shall not:

18               a.     make copies for, or allow copies of any kind to be made by any other  
19 person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;

20               b.     allow any other person to read Protected Documents; and

21               c.     use Protected Documents for any other purpose other than preparing to  
22 defend against the charges in the Indictment or any further superseding indictment arising out of  
23 this case.

24           6.     Defendant's attorneys shall inform any person to whom disclosure may be made  
25 pursuant to this order of the existence and terms of this Court's order.

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7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, telephone numbers, Email addresses, and physical addresses during the trial of this matter.

8. Upon conclusion of this action, Defendant's attorneys shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, telephone numbers, Email addresses, and physical addresses within a reasonable time, not to exceed thirty days after the statute of limitations governing post-conviction petitions has expired.

DANIEL G. BOGDEN  
United States Attorney

/s/ Sarah E. Griswold  
BRIAN PUGH  
SARAH E. GRISWOLD  
Assistant United States Attorneys

May 22, 2012  
DATE

/s/ Mace J. Yamplolsky  
MACE J. YAMPOLSKY  
Counsel for Defendant  
CANDIS J. GARDLEY

May 22, 2012  
DATE

**ORDER**

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ 2012.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE